

# Sills Cummis & Gross

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June 7, 2024

**VIA ECF**

Honorable Michael A. Hammer  
United States District Court  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Re: *Nina Agdal v. Dillon Danis*, 23-CV-16873 (MCA)(MAH)**

Dear Judge Hammer:

We represent Plaintiff Nina Agdal in the above-referenced matter. As discussed during the May 31, 2024 status conference, Plaintiff intends to file a Second Amended Complaint. Plaintiff shared a copy of the Second Amended Complaint with defense counsel, who consents to the filing. Enclosed for Your Honor's consideration is a Consent Order Granting Leave To Plaintiff To File Second Amended Complaint, signed by the parties.

Thank You for Your Honor's consideration.

Respectfully submitted,

/s/ Joseph B. Shumofsky

Joseph B. Shumofsky

Encl.

cc: Counsel for Defendant Dillon Danis

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

NINA AGDAL,

Plaintiff,

v.

DILLON DANIS,

Defendant.

Case No.: 2:23-cv-16873-MCA-MAH

**CONSENT ORDER GRANTING  
LEAVE TO PLAINTIFF TO FILE  
SECOND AMENDED COMPLAINT**

**THIS MATTER**, having been brought before the Court by Plaintiff Nina Agdal, by and through her counsel, Sills Cummis & Gross P.C., with the consent of defendant Dillon Danis, by and through his counsel Hartmann Doherty Rosa Berman & Bulbulia, LLC, and for good cause appearing:

**IT IS** on this \_\_\_\_\_ day of June 2024,

**ORDERED THAT:**

1. Plaintiff is granted leave, under Rule 15(a)(2), to amend her Amended Complaint;  
and
2. Plaintiff shall file her Second Amended Complaint within ten days of receipt of this Order.

\_\_\_\_\_  
HON. MICHAEL HAMMER, U.S.M.J.

Consented to by:

SILLS CUMMIS & GROSS P.C.  
Attorneys for Plaintiff Nina Agdal

HARTMANN DOHERTY ROSA BERMAN  
& BULBULIA, LLC  
Attorneys for Defendant Dillon Danis

By: /s/ Joseph B. Shumofsky  
Joseph B. Shumofsky, Esq.

By: /s/ Mark A. Berman  
Mark A. Berman, Esq.